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November 27, 2024

By ECF

Honorable Valerie Figueredo
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Etuk v. City of New York et al.,
24-CV-4989 (JHR)(VF)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for Defendant City of New York in the above-referenced matter.¹ I write in response to the Valentin Order issued by Your Honor on August 23, 2024 (ECF No. 10) to: (1) provide the Court with the names, shield numbers, and service addresses for nine of the ten “John Doe” NYPD officers that Plaintiff seeks to name in his Amended Complaint; and (2) request an enlargement of time from December 2, 2024, until December 16, 2024 to ascertain the service address of the remaining John Doe NYPD Officer to fully comply with the Court’s Valentin Order.

This is the second request for an enlargement of time to respond to the Valentin Order. This request will not impact any other deadline and does not present any prejudice to Plaintiff. Defendant City called and left Plaintiff messages to obtain his position to this request. However, as of November 27, 2024, Defendant City had not heard back. As such, Defendant was unable to ascertain Plaintiff’s position to this application.

First, upon information and belief, the names, badge numbers, and service addresses for nine of the ten John Doe NYPD Officers that Plaintiff seeks to name in his Amended Complaint are:

- Abdoulaye Bah (Shield # 28798)
NYPD Transit Bureau District 11
161 Street Station & River Avenue
Bronx, NY 10451

¹ This case has been assigned to Assistant Corporation Counsel Michael Futral, who is presently awaiting admission to the Southern District of New York and is handling this matter under my supervision. Mr. Futral may be reached directly at (212) 356 – 1643 or by email at mifutral@law.nyc.gov.

- Muhammad Molla (Shield # 25554)
NYPD Transit Bureau District 11
161 Street Station & River Avenue
Bronx, NY 10451
- Lt. David Pabon
NYPD Transit Bureau District 11
161 Street Station & River Avenue
Bronx, NY 10451
- Peter Esposito (Current Shield # 16602; Shield # at the time 17015)
NYPD Patrol Borough Bronx
450 Cross Bronx Expy.
Bronx, NY 10457
- Ely Gonzalez (Shield # 25463)
NYPD 46th Precinct
2120 Ryer Avenue
Bronx, NY 10457
- Ana Garcia (Shield # 15672)
NYPD Quartermaster Section
50-16 59th Place
Woodside, NY 11377
- Melba Cespedes (Shield # 08052)
NYPD Headquarters Security
1 Police Plaza
New York, NY 10038
- Christian Cacace (Shield # 31615)
NYPD Transit Bureau District 11
161 Street Station & River Avenue
Bronx, NY 10451
- Anajess Alvarez (Current Shield # 17015; Shield # at the time 31615)
NYPD Human Resources Division
1 Police Plaza
New York, NY 10038

Second, Defendant City also writes to request an extension of time to respond to the Court's Valentin Order. (See ECF No. 10). The reason for this request is because more time is needed to ascertain the service address for the remaining John Doe Officer involved in the events alleged in Plaintiff's Amended Complaint. Specifically, in investigating the allegations in Plaintiff's Amended Complaint, the New York Police Department's ("NYPD") Employee Resources Section

informed this office that Officer Raju Ahmed (Shield # 29165), the remaining Doe officer, resigned from the NYPD on July 29, 2023. Upon learning this information on November 25, 2024, this Office requested additional records from the NYPD to ascertain Mr. Ahmed's current or last known address. However, more time is still needed to obtain those records in order to provide the Court with Mr. Ahmed's address to effectuate service of process.

Therefore, Defendant City respectfully requests the Court grant a two-week extension of time from December 2, 2024, until December 16, 2024, to ensure it has sufficient time to ascertain the service address of the remaining John Doe NYPD Officer who Plaintiff seeks to name in his Amended Complaint.

The City thanks the Court its time and consideration of this matter.

Respectfully submitted,

Joseph Zangrilli /s/

Joseph Zangrilli

Senior Counsel

Special Federal Litigation

Cc: **By ECF and Mail**

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Staten Island, NY 10301

Pro Se Plaintiff

MEMO ENDORSED

Valerie

**HON. VALERIE FIGUEROA
UNITED STATES MAGISTRATE JUDGE**

Dated: 12/2/24

The extension requested herein is GRANTED.
The Clerk of Court is respectfully directed to
terminate the motion at ECF No. 18.